

## General Comments

1. Please note that DEQ's Risk-Based Corrective Action Guidance (RBCA) were updated in 2018. Please include the updated screening levels and adjust the list of COPCs where needed.
2. Table 2-1 through 2-3: Please define "TEQ" in the footnotes of these tables and any other tables presenting dioxin data. It is unclear how the TEQ values calculated in the Phase I Site Characterization report were incorporated into these tables.
3. Please note that the soil leaching to groundwater pathway should be further discussed even if a compound was not detected or found above groundwater or direct contact screening levels. A separate list of leaching COPCs should be generated and compared to groundwater analytical data. This will ensure that all leaching COPCs were analyzed in groundwater and in downgradient wells. Any compounds that exceed leaching to groundwater screening levels and were not analyzed for in groundwater should be retained as COPCs for the site. Please update all screening tables, flagging compounds exceeding SSLs as leaching COPCs for the site.